

# **TRINITY COUNTY ENFORCEMENT WORK PLAN FOR FY 2006/07; 2007/08; 2008/09**

## **I. Resources**

### **A. County Resources**

- PYs – .40 FTE total - licensed and unlicensed staff
- 1 licensed & trained staff person and 1 clerical person
- Workload expected – 6 Restricted Materials permits, 10 Notices of Intent (NOIs), 6 inspections, hexazinone use is a significant local priority because of an existing injunction and county history, investigations/complaints -1 maybe 2 per year.
- Expected program changes – no reductions or increases expected. I want to shift inspection priorities to greater oversight of structural applications and maintenance gardeners.

## **II. CORE PROGRAM ACTIVITIES**

### **A. Restricted Material Permitting**

#### **1. Site Monitoring –**

- Most restricted permits are issued for timberland sites and usually for a three-year period. Restricted material use is seasonal for occasional brush or weed control. Permit updates are for acreage or site ownership changes. Updated maps are required at the time of permit issuance or amendment.

#### **1. Hazard Evaluation –**

- Updated maps are required at the time of permit issuance and when permit changes occur.
- Hazards are evaluated by type and appropriate mitigations are adopted at the time of permit issuance or amendment. For example, a well is identified, noted on the permit map and engineering or flagging tape is required at the site to identify the well in order to create an appropriate buffer prior to application.

#### **3. Permit Guidance –**

- Restricted materials permits are reviewed and issued by the commissioner. DPR's Policy and Procedures Manual is available and used for guidance when needed.

## B. Compliance Monitoring

1. **Priority Investigations -**
  - No priority investigations have occurred in the past three years. Procedures developed by DPR and the criteria established in the Cooperative Agreement between CACASA, DPR, and U.S. EPA are followed during such investigations.
2. **Routine Investigations/Complaints -**
  - Investigations are conducted and reported to DPR in a timely manner.
  - A complaint log is maintained reporting the date, location, and identity of respondents, nature of episode, violations and resolution of the incident.
3. **Inspections –**
  - **Strategy** – Notwithstanding that forest herbicide applications will continue to be an area of significant concern in Trinity County, especially hexazinone applications, focus will shift to structural applications since seven companies are active in the county and thirteen are registered.
  - When applications are discovered in the field, inspections will be performed as time permits.
  - **Review process** – Inspections are reviewed with the enforcement liaison. Deficiencies are addressed as needed.

## C. Enforcement Response

1. **Tracking of violation histories –**
  - Because of the small number of restricted materials permits, the commissioner is aware of individual permittees' violation histories. The Enforcement Response Regulations will be followed to address repeat and/or serious violations.
2. **Review and Decision Process –**
  - When appropriate, violations are reviewed with the DPR enforcement liaison.
  - If in a specific instance, enforcement action is not appropriate a decision report will be filed for review by DPR staff.